

From: tim.figgie@shell.com
To: [Powers, Suzanne](#); [Morales, Javier](#)
Subject: Shell Puget Sound Plant 114 clarification
Date: Thursday, April 02, 2015 4:44:19 PM

Hi Suzanne and Javier, I have a few questions about the 114 requests that our site recently received.

RMP section:

Q6. – this question asks that we provide RMP incidences that occurred in the past 5-yrs, including the Feb 20 incident. We have had no incidences that meet the RMP criteria in the last 5 yrs. Also, the event on Feb 20 did not meet the RMP criteria because 1) it occurred on the flare, which is not a regulated unit and does not contain compounds about the TQ and 2) the release amount was not above any TQ. We would then respond to this question indicating no incidences apply. Is that acceptable?

CERCLA section:

Q3. – this question asks for all releases that have occurred at the facility during the last 5 yrs involving hazardous or extremely hazardous substances. Is this question looking for releases above the SARA/CERCLA reporting thresholds or any release no matter the quantity of the release? Also, if there was a release but it was not released to the environment, for example a spill to containment (not released to ground, water or offsite), should those be included?

You can call me if you prefer at the number below. Thank you for the clarification, Tim.

Office: (360)293-1525